

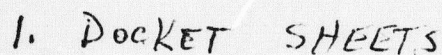
***United States Court of Appeals
for the Second Circuit***



APPENDIX

APPENDIX

B 2



2. NOTICE OF CONFERENCE

U.S. HUMAN RIGHTS COMMISSION - STATE OF - N.Y.

3. " " " " " "
APPEAL BOARD DECISION

又

4. LETTER DATED OCT. 20, 1971 ————— 344.

5. PRESS RELEASE DATED JAN. 20, 1972. #5.

6. SOMPSEE LETTER JULY 1, 1970 ————— #5.

7. PARKER ————— #6.

7. PARKS DEPT. - NYC - LETTER APR. 26, 1972 — #6.

8. F.I.C. — #7.

8. E.E.O.C. LETTER 10/3/72 ——— #7.

9. REPRINT OF NEWS ——— #8 + 15.

9. REPRINT OF NEWSPAPER ARTICLE - NOV. 19, 1973,
ONE OF MANY. — #9.

10. LETTER TO: BD. of EDUC. SEPT 20, 1976 — # 10.

11. ~~THE~~ MOTION FOR REARGUMENT - SEPT. 21, 1976 — # 10.

12. LETTER + AFFID.

12. LETTER + AFFIDAVIT - OCT. 4, 1976 — # 11.
13. U.S. DISTRICT COURT — # 12. + 13.

13. U.S. DISTRICT COURT PRO SE LETTER-SEPT 29, 1976 - #12. + 13.
AND DISTRICT COURT CLERK'S MEMO
14. COPY OF PAGE-CORP. COUNCIL - #14. + 14A.

14. COPY OF DISTRICT COURT CLERK'S MEMO LETTER-SEPT 20, 1976 — # 14.
~~AND~~ PAGE-CORP. COUNSEL AFFIDAVIT 9/27/76 — # 16.
 15. (A-B-C-) VARIOUS NOTES ~~AND~~ OF ETC. —

PAGINATION AS IN ORIGINAL COPY

CIVIL DOCKET

UNITED STATES DISTRICT COURT

Jury demand date:

JUDGE TENNEY

75 CIV. 4302

No. 106 Rev.

208-1 75-4302 08-29-75 3 442 1

ATTORNEYS

0844

RG

KRAMER, ELANOR

-VS-

BOARD OF EDUCATION,
COMMUNITY EDUCATION (CENTER #7),
STATE URBAN EDUCATION, SOMPSEC

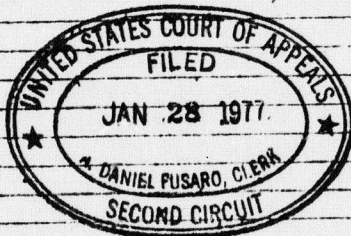
For plaintiff:

Eleanor Kramer Pro Se
50 West 97th Street
New York, N.Y.

214 Fernmore Rd. P.O. Box 467
Morningside, NY 10543

For defendant:

W. Bernard Richland
Corporation Counsel, Municipal Bldg.
NY, NY 10007 566-4217



STATISTICAL RECORD

COSTS

DATE

NAME OR
RECEIPT NO.

REC.

DISB.

S. 5 mailed x

Clerk

AUG 29 1975

IFP

S. 6 mailed

9-26-76

Marshal

Basis of Action: Review of the
decision for the E.E.O.C.

viol. of civil rights,
JOBS-

Action arose at:

Witness fees

Depositions

Clerk's Certificate

75 CN. 431

PROCEEDINGS

Date Order of Judgment Made

- 1) Filed complaint and issued summons.
- 2) Filed Order that the plttf. is permitted to proceed in forma pauperis without prepayment of fees, etc. Metzner, J.
- 3) Filed Summons with Marshal's returns. Served: State Urban Educ. Ctr by Mr. Levy on 12/5/75
Bd of Education-unex.
" " " by Mr. Sousa
Community Education Ctr by Mr. Morales, 1/5/76
- 4) Filed ORDER. Defts' time to answer complaint to 1/29/76. Tenney, J.
- 5) Filed ANSWER of defts.
- 6) Filed ORDER extending time of defts to answer to 2/25/76. Tenney, J. (nn)
- 7) Filed Affidvt of Service by Eleanor Kramer for plttf by mail to defts., a reply to answer and copy of notice of right to sue letter on 2/13/76.
- 8) PRE-TRIAL CONFERENCE HELD BY *may 1976*
- 9) Filed defts. notice of motion for summary judgment 7-16-76.
- 10) Filed defts. memo. of law re: support of motion for summary judgment.
- 11) Filed plttf's reply to motion for summary judgment 7/1/76.
- 12) Filed letter from petitioner to Judge Tenney opposing motion for summary judgment.
- 13) Filed OPINION# 44858. Defts' motion for summary judgment is granted dismissing complaint in this action unless the plttf files a motion for reconsideration with appropriate supporting documentation within 20 days of the filing of this order as specified. So Ordered. Tenney, J.
- 14) Filed Judgement that defts. Motion for Summary Judgement dismissing the Complaint is granted. Tenney J. Judgement Entered. Clerk. 09-17-76 nn
- 15) Filed City defts affidvt in opposition to plttf's request for reargument.
- 16) Filed OPINION#45181. Summary judgment for defts shall be entered forth with in accordance with this opinion. Tenney, J.
- 17) Filed Notice of Appeal by plttf to the U.S.C.A. from the order entered 9/21/77. copy to all parties.

A TRUE COPY
RAYMOND F. BURGHARDT, Clerk

By *[Signature]*
Deputy Clerk

OPINION #45181

Notice of appeal

Clerk's Office

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

Eleanor Kramer
Plaintiff

-v-

Board of Education of NYC
Defendant

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF
NEW YORK.

CASE NO. 75 Civil 4302

JUDGE Tenney

INDEX TO THE RECORD ON APPEAL

DEDUCE TO

Certified copy of docket entries

A-B

Complaint

1

Affidavit and order granting Plaintiff
Forma Pauperis Status

2

Summons and Marshal's Return

3

Order extending defendant's time to answer

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Answer of Defendant

5

Order extending defendant's time to answer

6

Plaintiff's affidavit of service

7

Defendant's notice of motion for summary
judgment

8

Defendant's memorandum of law re: motion for
summary judgment

9

Plaintiffs' reply to motion for summary judgment.

10

Plaintiff's letter to Judge Tenney opposing
motion for summary judgment

11

Opinion #44858

12

Judgment

13

Plaintiffs' motion for reargument

14

Defendant's affidavit in opposition to motion

15

Opinion #45181

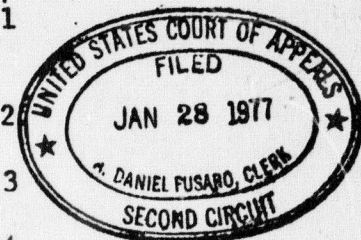
16

Notice of appeal

17

Clerk's Certificate

18



77-7050

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Eleanor Kramer,
Plaintiff

-v-

Board of Education of NYC
Defendant

CASE NO. 75 Civ 4302

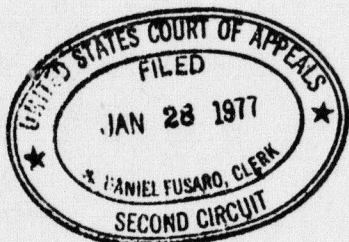
JUDGE Tenney

CLERK'S CERTIFICATE.

I, RAYMOND F. BURGHARDT, Clerk of the District Court of the United States for the Southern District of New York, do hereby certify that the certified copy of docket entries lettered A- B, and the original filed papers numbered 1 thru 18, and exhibits _____, inclusive, constitute the record on appeal in the above entitled proceeding; except for the following missing documents:

DATE FILED

PROCEEDINGS



IN TESTIMONY WHEREOF, I have caused the seal of the said Court to be hereunto affixed, at the City of New York, in the Southern District of New York, this 24th day of January, in the year of our Lord, One thousand nine hundred and seventy seven, and of the Independence of the United States the 201st year.

Raymond F. Burghardt
Clerk of the Court

Diary

①

STATE OF NEW YORK : EXECUTIVE DEPARTMENT
STATE DIVISION OF HUMAN RIGHTS

In the Matter of the Investigation by the
STATE DIVISION OF HUMAN RIGHTS

OF
ELEANOR KRAMER, ZOBEIDA PASCUAL,
& BARBARA RODGERS
against

BOARD OF EDUCATION OF THE CITY OF NEW YORK,
COMMUNITY EDUCATION CENTER; AND JOSE D.
RODRIGUEZ, DIR. JOHN L. CRAWFORD, ASS'T
DIR.; SOMSEC; JOE MATHEW, DIR., MADELINE
PETERS, ASS'T. DIR.

Pursuant to the Executive Law, Article 15
(known as the Human Rights Law)

TO: Sidney Siller, Esq.
120 East 41st Street
New York, New York

NOTICE OF CONFERENCE
AND
PRODUCTION OF RECORDS
(Investigation initiated by Division)

Case No. Id-C-336-70

YOU ARE HEREBY NOTIFIED to appear and attend before Jean MacPherson
the duly designated Regional Director herein of the New York State Division of Human Rights, at his her
office, 15 Lafayette Avenue, Brooklyn, New York
State of New York, on Tuesday, December 8, 1970, at 10 o'clock A.M.
for a conference in connection with the investigation in the above entitled proceeding with respect to
complainants being terminated from their employment.

You may bring a lawyer if you desire, but it is not necessary to do so.

Please bring with you all witnesses, books, papers, records and documents pertaining to this
matter, including:

STATE DIVISION OF HUMAN RIGHTS

Dated: 11/30, 1970

By: Jean MacPherson
Regional Director

(Black)

Human Rights Law (Executive Law, Art. 15)

"Sec. 295. General powers and duties of division. The division, by and through the commissioner
or his duly authorized officer or employee, shall have the following functions, powers and duties:

7. To *** subpoena witnesses, compel their attendance, administer oaths, take the testimony
of any person under oath, and in connection therewith, to require the production for examination of
any books or papers relating to any matter under examination or in question before the division. The
division may make rules as to the issuance of subpoenas which may be issued by the division at any
time in connection with an investigation or proceeding before it."

(2)

STATE OF NEW YORK: EXECUTIVE DEPARTMENT
STATE HUMAN RIGHTS APPEAL BOARD

ELEANOR KRAMER, ZOBEIDA PASCUAL and BARBARA
ROGERS,

Complainants-Appellant

Vs.

THE BOARD OF EDUCATION OF THE CITY OF NEW YORK;
COMMUNITY EDUCATION CENTER; SOMPSEC; JOSE D.
RODRIGUEZ, DIRECTOR, DISTRICT 7; JOHN L.
CRAWFORD, ASSISTANT DIRECTOR, DISTRICT 7;
JOE MATHEW, DIRECTOR; and MADELINE PETERS,
ASSISTANT DIRECTOR; COMMUNITY SCHOOL BOARD
NO. 7, CARMEN MARTINEZ, PRESIDENT,
Respondents

D E C I S I O N

Case No. CS-22074-70

APPEAL NO. 712

Before: Hon. J. Edward Conway, Chairman, Presiding
Hon. Emil Levin, Member
Hon. Irma Vidal Santaella, Member

This is an appeal by Eleanor Kramer, Zobeida Pascual and Barbara Rogers, Complainants-Appellant hereinafter called Appellants, from a Determination and Order after investigation of the State Division of Human Rights dated December 28, 1970, wherein it was determined that there was no probable cause to believe that the Respondents had engaged or were then engaging in the unlawful discriminatory practice complained of, and wherein the complaint was ordered dismissed.

Appellants, Caucasian females, in their verified complaint sworn to September 25, 1970, charge the Respondents with an unlawful discriminatory practice relating to employment by terminating them from their employment because of their color and sex. Appellants allege in their complaint, among other things, that they were employed by Respondents as dance teachers from the winter of 1967 to the summer of 1970, when they were discharged by Joe Mathew, a Respondent herein; that Appellants sought to learn the reasons for their discharge, but to the date of the complaint the Respondents had not informed them. According to the complaint there were 11 dance teachers in their group, of whom 9 were females and 2 were males; and of the 9 females 6 were Caucasians. Appellants further allege that of the 6 Caucasian females, 5 Caucasian females (including the Appellants) and 1 non-

Appellants allege that they were terminated because of their color and sex in violation of the New York State Human Rights Law.

The record shows that Appellants had been employed as dance teachers for the above-described time in the SOMPSEC Program, the objectives of which are, among other things, to enhance the self-image and sense of contribution to America's past and future of minority group pupils, and to provide for the Program, music and art enrichment. It also appears that the music and dance programs were giving even greater emphasis to Black and Latin-American music and dance. The general intention as stated in the SOMPSEC Program is to make every aspect of the Program contribute to developing the concern, interest and understanding of African, Afro-American and Puerto Rican culture, art, literature and heritage.

Respondents do not deny the allegations in the complaint as to the number and ethnic backgrounds of the dance teachers.

The record also shows that SOMPSEC serves about 3,000 children of whom 67% are Puerto Rican, 32% Black and 1% other.

The record also indicates according to Respondent, Madeline Peters, Assistant Director of SOMPSEC, that the funding of the SOMPSEC Program had been reduced \$140,000 less than the year before.

The record also shows, according to said Respondent Peters, that changes were made when the funds ended June 30, 1970; and a decision was made to reduce the amount of time, effort and money spent on the dance, art and music departments; and that the dance department would be reduced from 1 coordinator and 10 instructors to 5 dance instructors.

The record further shows that after the lay offs of the females five Caucasian /and one non-Caucasian female, the Dance Staff remaining, consisted of the following:

Three Females

only 2 Polly Rogers, Coordinator, Puerto Rican; Lucinda Ransom, *3 years*
White

representatives of minority groups would be given preference in the hiring and retention practices of Respondents; and that in accordance with such policy, minority groups were given preference in determining which instructors would be discharged to meet the reduced budget allowance for dance instructors. Appellants' Counsel also claims that the Appellants were of equal caliber to the dance teachers retained, and that Respondents chose Appellants and the other 3 females to be discharged to effect a desired racial balance.

Respondents deny all charges of discrimination.

Respondent Peters at the Conference, held by the Division of Human Rights on December 15, 1970, is reported to have said that the verbal directives of the Respondent Community School Board were to hire in accordance with the pupils' ethnic backgrounds, and that Respondent Mathew hired and fired following the ideas of the Board.

After reviewing the entire record, this Board concludes that the record is not sufficiently complete and this case requires further investigation before a determination should be made.

The record should show specifically the reasons for the termination of the 5 Caucasian females and one non-Caucasian female, in view of the highly laudatory references and commendations concerning the Appellants which are presently in the record. The record should show in addition, the ratings of all of the original 11 dance instructors as to competence, experience and ability; and particularly, the reasons for the retention of the 3 female and 2 male instructors. If Respondents discharged the Appellants and others for budgetary reasons, this question still remains - Why were they terminated and why were the others retained?

Investigation should also be made into the claimed so-called "gentlemen's agreement" with a view to learning whether there was in fact such a policy or an understanding on the part of the Respondents

same procedures were followed with respect to the 11 members of the original group of dance teachers.

At the hearing of this appeal Appellants' counsel also questioned the matter of the cut in the budget.

The record should show the total amount of the original budget of the SOMPSEC Program and by how much it was actually reduced in or about June 1970 when Appellants were discharged. It should also be shown what part of the total original budget was allocated to the Dance Program, and how much of that part was cut as a result of the budget reductions.

With respect to Appellants charge of discrimination on the grounds of sex, the record should show the work assignments given to the dance instructors; and if there were any differences in work assignments between the female and male instructors.

The present record contains the Regulations of the Board of Education with respect to non-licensed employees serving under interim appointments. Respondents take the position that Appellants under the Regulations had no tenure and therefore could be terminated. This Board does not question the right of Respondents to act in accordance with the Regulations of the Board of Education. If, however, it should be found that Appellants' dismissals were motivated by discrimination because of race or sex this would constitute an unlawful discriminatory practice under the State Human Rights Law, even though Appellants may have no tenure under the said Regulations.

It is not the intention of this Board to indicate to the Division of Human Rights what its Decision should be; but only that a Decision should not be made until the additional suggested information is obtained and made part of this record.

We, therefore, conclude that upon the record taken as a whole the aforesaid Order of the State Division of Human Rights dated December 28, 1970, is hereby

with a finding of no probable cause, was arbitrary, capricious
and an unwarranted exercise of discretion. Accordingly, we
remand this case to the State Division of Human Rights for
further investigation into the various matters mentioned herein.

DATED: MAY 19 1971

STATE HUMAN RIGHTS APPEAL BOARD

J. Edward Conway
J. Edward Conway, Chairman, Presiding
Emil Levin
Emil Levin, Member

*Another negative
decision ^{afterward} (almost 1 yr. later)
came
down with no
further investigation
or hearing.*

*During this time we were asked
by Sonpex for resumes as if we were to
re-apply.*

*We answered and referred
them to our credentials already
on file - no return answer
from them.*

STATE OF NEW YORK: EXECUTIVE DEPARTMENT
STATE HUMAN RIGHTS APPEAL BOARD

ELEANOR KRAMER, ZOBEIDA PASCUAL and BARBARA
ROGERS,

Complainants-Appellant

Vs.

O R D E R

Case No. CS-22074-70

APPEAL NO. 712

THE BOARD OF EDUCATION OF THE CITY OF NEW YORK;
COMMUNITY EDUCATION CENTER: SOMPSEC; JOSE D.
RODRIGUEZ, DIRECTOR, DISTRICT 7; JOHN L.
CRAWFORD, ASSISTANT DIRECTOR, DISTRICT 7;
JOE MATHEW, DIRECTOR; and MADELINE PETERS,
ASSISTANT DIRECTOR; COMMUNITY SCHOOL BOARD
NO. 7, CARMEN MARTINEZ, PRESIDENT,
Respondents

Before: Hon. J. Edward Conway, Chairman, Presiding
Hon. Emil Levin, Member
Hon. Irma Vidal Santaella, Member

The above-entitled appeal having come on to be heard on the 17th day of March 1971, and Eleanor Kramer, Zobeida Pascual and Barbara Rogers, Complainants-Appellant, having appeared by Sidney Siller, Esq., who submitted a brief and argued on their behalf, and the Board of Education of the City of New York, Respondent, having appeared by Charles Maurer, Esq. of the Office of the Corporation Counsel of the City of New York, who submitted on the record, and Community Education Center; SOMPSEC; Jose D. Rodriguez, Director, District 7; John L. Crawford, Assistant Director, District 7; Joe Mathew, Director; and Madeline Peters, Assistant Director; Community School Board No. 7, Carmen Martinez, President, Respondents, having appeared by John L. Crawford, Jose D. Rodriguez, and Joseph Sazzente, who argued on their behalf and the State Division of Human Rights having appeared by Henry Spitz, Esq., General Counsel by Theodore Debowy, Esq., who submitted on the record, and the panel having reviewed the record and having considered the said brief and the arguments of the parties and having decided that the Determination and Order of the State Division of Human Rights in dismissing the complaint of the Complainants-Appellant was arbitrary, capricious and an unwarranted

exercise of discretion, Hon. Irma Vidal Santaella dissenting, it is

ORDERED that the said Order of the State Division of Human Rights made herein on the 28th day of December 1970 be and the same hereby is vacated, and it is

FURTHER ORDERED that the above-entitled proceeding be and the same hereby is remanded to the State Division of Human Rights for further investigation in accordance with the decision herein and for such final determination by the State Division of Human Rights as shall then be warranted by the record taken as a whole.

DATED: May 19, 1971

STATE HUMAN RIGHTS APPEAL BOARD

By: J. Edward Conway
J. Edward Conway, Chairman Presiding

TO:

Miss Eleanor Kramer
208 Thompson Street
New York, New York 10012

Mrs. Zobeida Pascual
39-89 50th Street
Woodside, New York 11377

Mrs. Barbara Rogers
211 West 106 Street
New York, New York 10025

The Board of Education of the
City of New York
110 Livingston Street
Brooklyn, New York

Community Education Center
State Urban Education Program
Office of School District 7
501 Courtlandt Avenue
Bronx, New York 10451
Att: Mr. Jose D. Rodriguez,
Director

Mr. Jose D. Podriguez, Director
Community Education Center
State Urban Education Program
Office of School District 7
501 Courtlandt Avenue
Bronx, New York 10451

Mr. John L. Crawford, Assistant Director
SOMPSEC, State Urban Education Program
Office of School District 7
501 Courtlandt Avenue
Bronx, New York 10451

Miss Madeline Peters, Assistant Director
SOMPSEC, State Urban Education Program
Office of School District 7
501 Courtlandt Avenue
Bronx, New York 10451

Sidney Siller, Esq.
370 Lexington Avenue
New York, New York 10017

Mr. Rufus Shorter, Director
Community Education Center - Room 233
The Board of Education of the
City of New York
110 Livingston Street
Brooklyn, New York

Mrs. Carmen Martinez
Local School Board No. 7
501 Courtlandt Avenue
Bronx, New York 10451

Commissioner Jack M. Sable
State Division of Human Rights
270 Broadway
New York, New York 10007

Henry Spitz, Esq.
General Counsel
State Division of Human Rights
270 Broadway
New York, New York 10007

3+4

October 20, 1971

Miss Eleanor Kramer
208 Thompson Street
New York, New York 10012

Re: Kramer, Pascual & Rogers vs.
Board of Education of the
City of New York, et al.
Case No. CS-22974-70

Dear Miss Kramer:

This is in further response to your recent telephone call to me, in which you made inquiry regarding the status of the above-captioned matter.

As I told you during the course of our second phone conversation, a search which I caused to be made indicated that, in fact, an administrative shortcoming on our part led to a delay in sending to you a second determination, in response to the remand of your case to us by the Appeal Board. I can only express my regret for that. However, movement has recommenced in the matter, and I have asked that those working on the case expedite their investigation by making the same a high-priority item.

You can be assured that a second determination will be made as expeditiously as possible following completion of the reinvestigation of this matter, which has already commenced. In the meantime, I should like to thank you for your patience and understanding.

Very truly yours,

Arthur W. Stern
Director
Downstate Operations

cc: Mrs. Zobeida Pasqual
Mrs. Barbara Rogers

These errors run consistently with all government agencies in my "reverse discrimination" case as if it were too hot to handle.

Delivered to Mrs. Zobeida Pasqual by Mr. [illegible] on 10/21/71

(5)

- F O R R E L E A S E *

Tel.# 832-6670

WHAT: 3 White Dance Teachers to protest New York State Division of Human Rights' failure to assist victims of reverse racial discrimination.

WHERE: Human Rights Commission (State of New York),
270 Broadway (250)
NY 10007

WHEN: Thursday, Jan. 20, 1972 at 9:30 A.M.

Three former Dance instructors, Caucasians, who were illegally dismissed from their positions by SOMPSEC, (South Bronx Multi-Purpose Supplementary Educational Cultural Center), a program funded by the State Urban Education on E. 157th St.; as a result of reverse, racial prejudice, will picket the New York State Division of Human Rights.

Eleanor Kramer and Barbara Rogers, two of the instructors, today strongly attacked the New York State Human Rights Commission for their failure to investigate their case as directed to by the State Human Rights Comm. APPEAL BOARD in May of 1971.

After their illegal discharge, Ms. Kramer and Ms. Rogers requested a hearing of their charges, which were denied on Dec. 28, 1970. After appeal, the local Brooklyn Division was directed to investigate the charges of reverse racial prejudice against the three white dance teachers. As of this date, no investigation and decision has been made.

The facts about this case, according to Ms. Kramer, are being deliberately suppressed to her economic disadvantage.

(6.)

SOMPSEC

STATE URBAN EDUCATION
388 EAST 157 ST. BRONX, N.Y. 10451

JOAQUIN MATHEW
DIRECTOR

TELEPHONE
993-6070

MADLINE PETERS
ASST. DIRECTOR

10A

Pascual

July 1, 1970

Dear Mrs. Pascual: one of my co-plaintiffs (I had some letter --

During my last meeting with the Dance Department, ^{can't find it}
I had stated I would advise you concerning any changes
within the new Sompsec Program starting September, 1970.

There has been a reduction in the Dance Department
staff and therefore, I will be unable to accomodate you
in the Fall season.

May I thank you for your past services, and if you
need any references in securing new employment do not
hesitate to call me.

Sincerely,

Joaquin Mathew
J. Mathew,
Director

*we did!
never answer!*

JM/rs

never forgotten!



John V. Lindsay,
Mayor



Parks, Recreation and Cultural Affairs Administration

August Heckscher, Administrator,
Commissioner of Parks

Joseph P. Davidson,
First Deputy Administrator

The Arsenal • 830 Fifth Avenue • New York, New York 10021

Department of Recreation

Joseph W. Halper,
Commissioner

Raymond R. Norat,
Deputy Commissioner

Telephone:

April 26, 1972

Eleanor Kramer
208 Thompson St.
New York City 10012

Dear Eleanor,

I greatly regret that the press of unexpected commitments made our work schedules impossible to reconcile. The ground work which you laid choreographically both at Baruch in the Wizard, and at St. Mary's, for Carnival, were invaluable. The children and the staff will miss you.

Sincerely,

Talie Nerhaugen

Director, Performing Arts Workshops

* I worked right across street from school
I formerly taught in & attempted, in
vain, to reach respective parties.
Phone messages never answered.
Also used some of the same children
as formerly at Somper & P.S. 27.
Went to District #7 office -- Low
business hours. No one would come
out to talk to me. E.K.



EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NEW YORK DISTRICT OFFICE
26 FEDERAL PLAZA, ROOM 4002
(At Foley Square)
NEW YORK, NEW YORK 10007
264 - 3840

8 + 15

10/3/72

TNY 3 0434
0435

Ms. Eleanor Kramer
208 Thompson St.
NYC, NY 10012

Dear Ms. Kramer:

We have received your communication alleging unlawful employment practices in violation of Title VII of the Civil Rights Act of 1964, as amended. Under Section 706 of Title VII, this Commission cannot accept your complaint until a state or local agency has had at least 60 days to try to resolve your problem.

We have, therefore, sent your complaint to the New York State Division of Human Rights, 270 Broadway, New York, N.Y. 10007, and ask you to cooperate fully in their investigation of this matter. Please contact them immediately to be certain that all requirements for commencing proceeding in your case have been met.

Unless we hear from you to the contrary, we will automatically file your complaint after the 60 day period has ended. If the state should end its proceeding earlier than 60 days we will file the complaint when it does so, unless we hear from you to the contrary.

If the state has not been able to resolve your complaint, we will undertake an investigation as soon as possible.

I must, however, tell you that we have many charges on file and it may be many months until we can actually begin an investigation. Please be patient and we will contact you as soon as resources allow.

Sincerely,

DM Mackey

Daniel Murnane Mackey
District Director

9.

NOV 24 1973

SWISS FAMILY REN-
SON, music. National
Theater Co., Brooklyn Col-
lege Gershwin Theater,
Campus Rd. and Hill Pl.,
Brooklyn, Saturday 1, 2
8:00, 10:00

College students will soon take their act on a travelling tour of borough public schools in a unique program to teach grade school students the rudiments of rhythm and musical notes.

"We make the notes come alive in the physical body," said Eleanor Kramer, the student choreographer. "The play is written so that children from kindergarten through the eighth grade can understand and get involved responsively."

Ms. Kramer, who has performed the play in the public schools before with her own dance group, has been teaching to other BC students in preparation for their venture into the community.

and Kramer, 21, graduated from BC last year with a B.S. in education. She is now a student teacher at the Flatbush High School.

Ms. Kramer, who has appeared Off-Broadway, in summer stock and in many concerts, has studied dance at Juilliard, Connecticut College and with Jose Limon. She has taught dance in private studios, in adult education and for other organizations, but returned to BC as a student because she wanted to get her final education degree.

Brooklyn Daily Bulletin

Monday, November 19, 1973

**American Music
Feature of Concert
At Bklyn College**

American sacred and secular music of the late 18th and 19th centuries will be the feature of a special concert Monday evening, Nov. 26 sponsored by the Brooklyn College Institute for Studies in American Music.

The concert is set for 8 p.m. in the college's Gershwin Theater, Campus Road and Hill Place, near the Flatbush-Nostrand Avenue intersection in Brooklyn. Tickets are \$2.00, with a special student rate of \$1.00.

**Dance Groups will Travel
Throughout Boro Schools**

A group of Brooklyn College dance students will soon take their act on a travelling tour of borough public schools in a unique program to teach grade school students the rudiments of rhythm and musical notes.

The students, in two groups of four, will visit area schools to perform in an original dance play written by a Brooklyn College student, who doubles as a professional dancer, singer and playwright. The play, in rhyme, song and pantomime, attempts to show children by visual means the relationships of one note or one beat to another.

"We make the notes come alive in the physical body," said Eleanor Kramer, the student choreographer. "The play is written so that children from kindergarten through the eighth grade can understand and get involved responsively."

Ms. Kramer, who has performed the play in the public schools before with her own dance group, has been teaching to other BC students in preparation for their venture into the community.

"The play becomes an educational exercise for everyone," said Ms. Kramer. "Both the grade schoolers and the Brooklyn College students who are learning professionalism and performance techniques as well as how to relate to audiences."

Also included in the 45-minute program designed by Ms. Kramer is a typical dance class, which demonstrates to students ballet technique, ballet study and other ballet terminology. The dance demonstration is then topped off with a fast-paced trip around the world as the students give examples of different types of dances from Europe, the Far East, Africa and the U.S.

Ms. Kramer, who has appeared Off-Broadway, in summer stock and in many concerts, has studied dance at Juilliard, Connecticut College and with Jose Limon. She has taught dance in private studios, in adult education and for other organizations, but returned to BC as a student because she wanted to get her final education degree.

Let them
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The Daily Times
MANHATTAN, N.Y.
NEW YORK CITY MET AREA
11-2005

NOV 26 1973

College cites Kramer

Eleanor Kramer, 21, graduated from Brooklyn College last year with a B.S. in education. She is now a student teacher at the Flatbush High School.

* Howard; when I mentioned budget cuts, I was being polite & discreet as no decision had yet been reached calling it otherwise.

-- Corp. Counsel picks on this.

September 20, 1976

Board of Education
of the City of New York-Personnel Div.
110 Livingston St.
Brooklyn, N. Y.

Dear Sirs:

In June of 1970 I was laid off from employment in School District #7 in the South Bronx, for reasons of budget cuts from State and Federal Programs.

During such employment for (S.O.M.P.S.E.O.), I was required to pass a competency examination for which I was awarded a certificate (#410365), through your organization.

Further placement was denied me by the Board because I then lacked credentials in the form of college degrees. Such degrees have now been obtained on the Master's Level in Urban Affairs (Hunter College; BA-Brooklyn College).

Enclosed herewith is updated resume for your active (and possibly retroactive) consideration.

Very truly yours,

Eleanor Kramer (Navarrp)

214 Fenimore Road
Mamaroneck, N.Y. 10543

Encl.

cc: Carol Moyner, Corp. Coun.

TO DATE 2/23/77
STILL NO
RESPONSE WHATSOEVER
EVEN TO THIS LETTER
5 MOS. AGO.

(11)

September 21, 1976

Honorable Charles H. Tenney
U.S.D.C., S.D.N.Y.
Foley Square
New York, N. Y. 10007

Re: Kramer v. Bd. of Ed., et. al.
75 Civ. 4302 (C.H.T.)

MOTION FOR REARGUMENT

Dear Judge Tenney:
~~Honorable Sir:~~

Please be advised that because I have never received the Court's disposition of Motion for Summary Judgment, (notwithstanding various attempts on my part to do so), I am now making application for a redetermination of same.

Please also be advised that an unsigned copy of judgment was finally sent me by Ms. Noymer of the Corporation Counsel only yesterday (received Sept. 20th), and to date, is the sole source of any events taking place to this date.

I believe that on the uncontroverted facts, the legal decision should be otherwise; and as to the controverted facts that were materials in this decision (as follows):-

1) That during the course of standard procedural hearings at the New York State Human Rights Commission (HRC), defendants (S.O.M.P.S.E.C.-Employer) requested resumes to fill existent job vacancies (same performance category that we had been terminated from). Our prompt response referred to the resumes we had already filed with ~~the~~ the Local School Board #7, and the Community Education Center, and the Board of Education (NYC) (along with fingerprints and other procedures). This was our response along with the opinion of the attorney we had retained at that time. We never heard further on this. and appeal.

2) That the decision by the State HRC Appeal Board was that the reasons (or the "why") in choosing those that remained in SOMPECO's employ and those that were terminated was never (before or after or during) explained or clarified

Seven female persons-6 white, 1 Hispanic-dark were terminated; three of whom preferred and instituted action; with only myself (with the verbal support of other two) sustaining charges.

- 2 -

to this date.

- a- Our qualifications were never disputed.
- b- Our seniority (overall) was disregarded.

3) That the Federal Office of Equal Opportunity (OEO) or (EEEO) received and dismissed the case from the incomplete files of the HRC.

- a- On the second hearing session, we were informed that the minutes taken on the first, initial hearing were misplaced or lost. Pertinent statements were made then, and subsequently denied.

- b- OEO's standard procedure was to follow normal procedures in order for me to then proceed with a "right to sue" permission letter, but only after their dismissal of same.

4) That subsequent attempts at employment at another South Bronx Community organization (ASPIRA) denied me an equal opportunity for same.

- a- Diligent follow-ups on my part to this job, as advertised in the New York Times, resulted in my resume being lost or misplaced, and a request for another. At this same time, I was promised a personal interview. I submitted a second resume, and another inquiry confirmed receipt of same. With a follow-up interview. This never materialized.
- b- Though Aspira is not directly affiliated with any of the defendants, their Board of Directors comprise some of the same members who sit on other Boards involved with the Community Education Center.

5) That recent, innumerable attempts at obtaining research information from the Community Education Center, was never forthcoming, resulting in directly discrediting my final grade during my recent completed graduate studies at Hunter College.

- a- Claims that such information was actually mailed was deliberately followed up. Within this same project I had received all other information requested in the same way from other organizations in other parts of the city. I requested tracers at the Post office and other offices and mail rooms that might be involved. Nothing was ever found.

- 3 -

Sir, that the continuing state of discriminatory practices against me postdate the Title VII application to municipalities provisions, and is in constant violation of my Civil Rights, and equal protection under the law, should warrant your further review and consideration.

Respectually yours,

Eleanor Kramer (Navarrp)
214 Fenimore Road
Mamaroneck, N. Y. 10543

cc: Carol Noymer, Corporation Counsel

Affid. EXH

** Only 13 days after I first heard of the decision -- Judge Tenney's clerk, I understand, never submitted this letter to him with accompanying exhibits!*

from Sept. 20th

Oct. 4, 1976

12

Honorable Charles H. Tenney
U.S.D.C.-S.D.N.Y.
Foley Square
New York, N.Y. 10007

Re: Kramer v. Bd. of Ed., et.al.
75 Civ. 4302 (C.H.T.)
PRO SE

Dear Judge Tenney:

I wrote you a letter dated September 21, 1976 asking for reargument of the motion for summary judgment that you decided in favor of the defendants in the above-entitled case. After mailing that letter I received, for the first time, a copy of your decision on the motion. I would like you to allow this letter to supersede my letter of Sept. 21st. I make this request in accordance with the recommendations of Ms. Frances Salton, the pro se clerk of this court, who sent me the copy of your decision with the explanation that the delay in its reaching me was due to its having become lost or mislaid prior to being mailed out.

I believe I can show, as your opinion suggests that I applied to some of the defendants for employment after the effective date of Title VII, and was refused for racially discriminatory reasons. The enclosed affidavit sets forth the occasions and the relevant facts. I trust this will be sufficient to justify reconsideration of your original decision.

Very truly yours,

Elenaor Kramer-Navarro
214 Menimore Rd.
Hamaroneck, N.Y. 10543
(914) 698-1997

Encls.

cc: Corporation Counsel, Carol Meyner

UNITED STATES DISTRICT COURT
IN DISTRICT OF NEW YORK

ELEANOR KRAMER,

Plaintiff

BOARD OF EDUCATION, COMMUNITY
EDUCATION CENTER, DIST. #7, et al.

AFFIDAVIT

75 Civ. 4302 (OHT)
PRO SE

13.

ELEANOR KRAMER, being duly sworn, deposes and says:

1. I am the plaintiff in the above-entitled action. I make this affidavit in support of my motion to reconsider the judgment made by the defendants.

2. I was in contact with Jose Rodriguez/and the Board of Education on several occasions, before and after the Date of March 24, 1972 regarding possible re-employment and/or relocation of same.

3. During the course of hearings and appeal at the State Human Rights Commission (HRC), vacancies continued to exist. At some point in time, none of the plaintiffs were recalled (myself, Barbara Rogers, and Zobeida Pascual); but it is my understanding that one Teresita La Tana was recalled back to S.O.M.P.S.E.O. to teach. All of us, plaintiffs, had seniority over Ms. La Tana.

4. It is also my understanding that Ms. Carmen Estrada was reemployed by relocation to another school district. Upon my inquiries into this possibility, the Board of Education insisted on additional credentials, i.e., a college degree. To my knowledge, Ms. Estrada did not have one.

5. At one point Mr. Rodriguez referred me to the South Bronx Action Theatre, also funded by the Community Education Center, as was S.O.M.P.S.E.O. and also within School District #7 in the South Bronx. Responding at an appointed time with a Mr. Fred Davis, The Director, I found that Mr. Davis was not in and could obtain no further information. Subsequently I learned that a Ms. ~~XXXXXXXXXX~~ Poligona Rogers was employed by the South Bronx Action Theatre, and through their auspices was teaching at P.S. 27, the school, that I had taught at for two years while employed at S.O.M.P.S.E.O., whose principal and vice-principal had requested my return, but could not be accommodated because of my no longer being affiliated with the sponsoring organization, S.O.M.P.S.E.O.

6. The Board of Education would not consider relocating me for lack of credentials, and because they "had no openings". Subsequent to this, I requested active status in their files should an opening arise. When hearing of exams, (they never informed me of openings when they occurred) I would apply, only to be told that I missed the application deadline dates. I would like the Court to be advised that I had a Certificate of Competency from the Board of Educ.

and that this credential was all that was required to teach for the four years I was employed at S.O.M.P.S.E.O.

7. Enclosed are documents dated 1971, early 1972, late 1972, 1973 and a copy of a letter also mailed to the Corp. Counsel very recently, whereby I had reason and occasion to contact both the Board of Education and Mr. Rodriguez regarding possible employment. Though not directly relevant, it illustrates my activity in educational programs which prompted my continual efforts at retaining professional status in my field and sustained interest in my candidacy for employment. On these occasions, I sent newspaper articles, clippings, resumes, printed brochures, hoping for further response. In fact, in June of 1972, a Ms. Trudy Aybar, working at a school district through the Board of Education met me in the lobby of the Board of Education in Brooklyn where I tried to obtain employment in their Saturday Cultural Arts Program. While there I again stopped at the Personnel counter at the main building a block away, where the clerks refused me any advance information at openings, but told me I would have to wait for list openings. They also told me I would have to keep checking on their bulletin board. But as related before, this was no guaranty that I would see the notice "on time" or before the deadline date. I could not realistically visit this board every day.

The document enclosed re: Jan. 1972 was before the second decision came down from the State HRB, which the Appeal Board directed further investigation as the 1971 document shows and also illustrates my recognized qualifications. The document dated October, 1972 was approximately when I tried to contact Mr. Rodriguez again, in order to avoid starting action at the HRB (as enclosed).. 1973 article, along with brochure was sent to School District #7 in the hopes of employment within other cultural budgets that existed as well.

The Sept. 1976 letter to the Board of Education was in answer to their initial request for college credentials some time ago, and was not meant to fill any legal gaps as the Corporation Counsel may have assumed; as I sent them a copy hoping for a gesture of direction from them to the Board of Education for consideration of my employment status. This was in urgent reaction from my NYHEAO (Student Loans) contract coming due without any job future in sight.

8. It is beyond my understanding of anything I've learned to understand as to why not one conciliatory step in settling this issue was ever made. Any efforts I made, in addition to the above, was ignored with a carelessness of rudeness, hostility, a run-around, and continually biased attitudes. If the court expected me to do more, then I am being asked to endure insult on top of injury, and what would be intolerable to most human beings..

9. This whole traumatic procedure has left me demoralized, debilitated, and possibly defeated. I had to follow through the Marshall's office when they didn't fulfill their service duties. The Pro Sec office overlooked a defendant, and the forms to assist me in obtaining counsel. The energy I had to exert to compensate for perhaps honest errors was too demanding, and I just have no more fight left. As the emotional cost to me is just too high, I will concede defeat should this decision not be in my favor or prolonged any further; and the system (of justice?)...emptier...

10. In conclusion I wish to argue that the Board of Education in not coping with the initial act of discrimination has prolonged and sustained their failure in acting responsibly: and thus, endorsed the biased

action and behavior of the other defendants; and that, the Federal legislature, in failing to recognize all citizens with the Civil Rights Act in 1964, and not awarding this protection until 8 (eight) years later, failed miserably in their obligation to Constitutional principles; and that same eight years is not in excess of the approximately 200 years that Affirmative Action is supposed to make me, and others like me, pay a heavy cost, resulting in unconstitutional and human error; and that, the Court, in allowing its hands to be tied in this respect, becomes an additional weight of infliction. I fought for Civil Rights before it was popular, and I don't have enough fight left for myself. That this situation continues, and unofficially can continue for lack of any higher power or authority, is a fact. It is happening to me and many others in education, employment, and personal expression through a new kind of fear. That the Corporation Counsel as a Civil servant, can unethically defend an obvious wrong, because a badly enacted law allows them to do so leaves me with my back to the wall. And the end result is, in fact, that there is no opportunity, legally or in practice, out there now, or if the Court allows, ever.

October 6, 1976.

6

*Keep in my
editorial file!*

10 copies

Appendix
1. 2 Cover & decision
2. notice of appeal
3. copy of docket sheets
plus exhibits

PRO SE OFFICE
UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK
OFFICE OF THE CLERK
U. S. COURTHOUSE

FOLEY SQUARE, NEW YORK, N. Y. 10007

RAYMOND F. BURGHARDT
CLERK

September 20, 1976

75 Civ 4302 (CHT)
Pro Se

14.
13 days
to Oct. 4.

Eleanor Kramer
214 Fenimore Rd
Mamaroneck, NY 10543

Dear Ms. Kramer

THEMATIC

The opinion in this case was ~~lost or misplaced~~
~~somewhere after entry in the unit.~~ We have therefore
~~asked chambers to send us a copy for photocopying.~~ In
the course of speaking with them, I learned that the
judge had not absolutely dismissed your case, but had
given you 20 days to file a Motion for Reconsideration
WITH APPROPRIATE SUPPORTING DOCUMENTATION demonstrating that you
"actively sought" and were "denied employment" on racially/sex discriminatory
grounds.

Since there was a mistake on our part, the best
thing for you to do is NOT to appeal yet.

60(b), within the next 10 days if possible, asking, under Rule
for reconsideration, as suggested above, on the
grounds of the court's omission to send you notice thereof.
I enclose a motion guidelines form, and the decision. Attach the
top sheet, which has today's date to your motion as evidence.

However, should you wish to appeal at a later time,
I am sending you the form for appealing as a poor person.

Under separate cover, I have sent you the com-
plaint guidelines and the in forma pauperis affidavit
for the district court. A suit against the court would
have no chance of success if your only complaint is that
papers sometimes get lost.

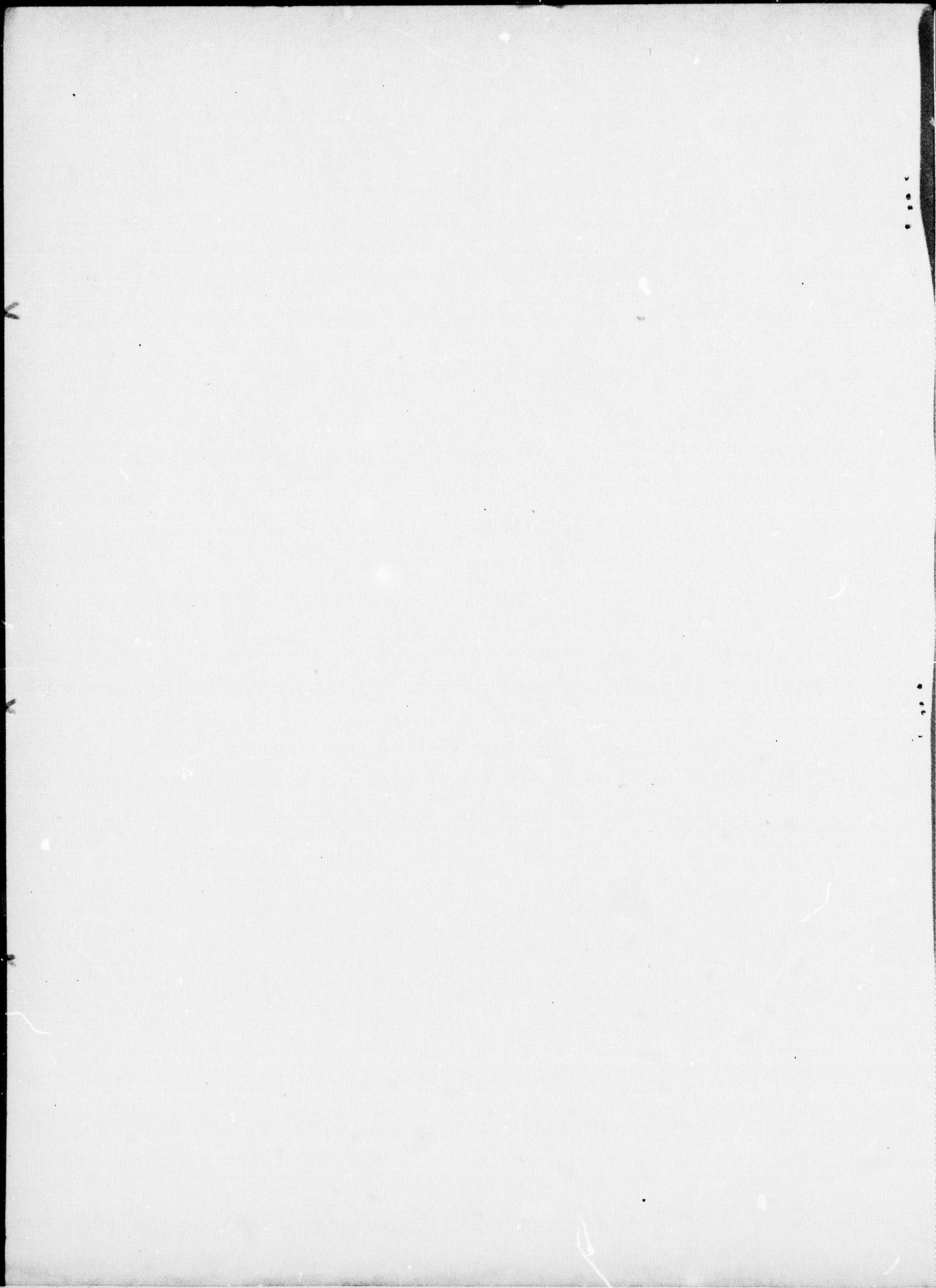
Yours truly

F. Salten

Ms. Salten
Pro Se Clerk

why - at the Court's
lwr - was I given only
10 days when judge
originally gave me
encl

20 days - this is what caused no further
reconsideration of amended motion for reconsideration
was it clerical decision?



Re: Pro Se 75 CIV 4302 CHT

1/4/76

This afternoon (12:45 PM) Officer Finnocio called upon Mr. Burghardt to complain about constantly being called upon to remove apparently peaceful individuals from the Pro Se Office.

Today he was called upon to remove Ms. Kramer from that office.

Ms. Kramer had the following complaints:

1. The Pro Se Clerk has treated her with rudeness on the telephone and in person.
2. A decision was entered on 7/28/76, of which she was not advised, which would have allowed her 20 days from the date of the opinion to file a motion for reargument.
3. The Pro Se Clerk did note the error, however, and almost two months after the date of the opinion, she wrote to Ms. Kramer (letter attached), advising the pltf. to submit a motion for reargument. *when not 20 days*
4. Ms. Kramer claims to have mailed to the court a motion to reargue. Such a motion is not in the file, was not docketed, and is not in the Pro Se file on Ms. Kramer. However, Ms. Kramer also claims to have served the defendant with the same motion, and apparently the deft. did receive a copy, since they filed answering papers on 9/28/76.
5. On the same day as the Pro Se Clerk sent the attached letter to the pltf, Judge Tenney's judgment dismissing the complaint was filed. The docket sheet reflects that notices were mailed, but Ms. Kramer claims not to have received such notice or a copy of the document.

6. Ms. Kramer notified the Pro Se office of a change of address; but this change of address was not shown on the docket sheet, therefore if the docket clerk did send a notice it may have not reached Ms. Kramer. Note that no returned card was in the file. (Ms. Kramer also claims to still be receiving mail addressed to her old address through the Post Office change-of-address system.)

7. On 9/30/76, another opinion was entered on the docket. Ms. Kramer claims not to have received notice of this decision, either by postcard or by copy of the document.

Presently Ms. Kramer is on jury duty next door at the state court. I suggested that she stop by tomorrow afternoon to see what resolution the Clerk has come to on this matter.

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Corp. Counsel
affidavit

5. Deponent lacks any knowledge of the matter contained in paragraph #4, but wishes to point out firstly that Aspira is not a party to the instant action and second that plaintiff admits that Aspira is not affiliated with Community School Board #7. Deponent wishes to further point out that plaintiff has failed to come forward with any thing other than vague and unsubstantiated allegations regarding Aspira and has not met this Court's requirements for reconsideration. But, assuming arguendo, that plaintiff had shown some act of discrimination by Aspira, such act would not provide a vehicle for a claim for relief against the defendants herein.

6. Upon information and belief, plaintiff's position along with many others was eliminated for budgetary reasons. Upon information and belief, subsequently, when outside funds were cut off, the entire program in which plaintiff had participated was eliminated. Plaintiff admits that she "was laid off from employment in School District #7 ... for reasons of budget cuts." (Please see plaintiff's letter annexed hereto as Defendants' Exhibit "1"). Plaintiff has not demonstrated that she sought and was refused employment after March 24, 1972 for racially discriminatory reasons. Plaintiff's September 20, 1976 letter to the Board of Education during a period when approximately 10,000 tenured Board of Education employees have been laid off clearly cannot serve as a basis for a finding of discrimination against her.

"their"
reason

Pleasantville told to rehire teacher

By PETE WALSH
Gannett News Service

ALBANY — Illustrating a problem increasingly facing schools as enrollments decline and budgets tighten, State Education Commissioner Ewald B. Nyquist has ordered the Pleasantville school board to rehire a teacher who was fired when others had less seniority.

He held in an appeal that the school board violated the tenure rights of Charles Young, a high school driver

education and physical education instructor, when it discharged him in July 1975.

Nyquist ordered the board to rehire Young and pay him his back salary, less any other earnings he had during the period.

The commissioner's decision said that since rehiring Young might make one teacher surplus in his tenure area, the district could either create another physical education position, or fire another teacher with less seniority.

Young's difficulties began

in July 1974 when the district abolished its driver education program for budgetary reasons.

He had joined the Pleasantville district in 1969 and

taught physical education and driver education before being granted tenure in both areas in June 1972. Thereafter, he taught driver education exclusively until the program was abolished and

he was reassigned to teach physical education.

But in July 1975 the school board notified Young that it was abolishing one physical education position and that he was fired.

School aid suit goes on

MINEOLA, N.Y. (AP) — Testimony is to resume next week in court here on a lawsuit challenging New York state's method of financing public schools.

Twenty-six school districts and four major cities, including New York, filed the suit in Nassau County Supreme Court.

East Islip, Long Island

was added Thursday as a plaintiff.

The suit challenges the state's method of allocating school aid through the property tax.

The State Court of Appeals has ruled, in a case involving admission to Downstate Medical Center in Brooklyn, that "reverse discrimination" is legal—"in proper circumstances."

The decision was so heavily weighted with restrictions, hedges and expressions of misgivings as to make it useless as a firm, definitive precedent.

So the fundamental issue remains—and a thorny one it is: Should groups denied equal access to schools, professions and jobs in the past be given preferential treatment now, even at the cost of discriminating against others?

We believe government has a clear obligation to see that all Americans are afforded the same opportunity for basic schooling. It should also see that no artificial impediments prevent an individual from realizing the maximum potential from his talents and skills.

But the whole concept of equality is violated, not affirmed, by going further. It would be grossly unfair to compensate some people for past injustices by punishing persons who had no part in inflicting those injustices.



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about finances.
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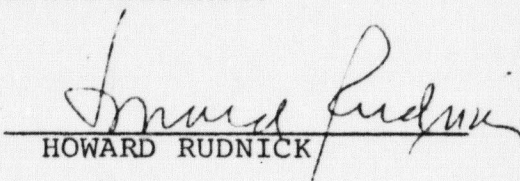
A SMALL PICTURE

17A

HOWARD RUDNICK, an attorney admitted to practice in the courts of New York State, affirms the following under penalties of perjury:

I recall having seen a letter from ASPIRA, located at East 149th Street, Bronx, New York, addressed to Eleanor Kramer Navarro, thanking her for her interest in applying for the position as director of their program. The letter stated that should any opening arise, they hoped she would apply again. The letter further made some reference to their having interviewed Eleanor.

Dated: March 10th, 1976.
New York, New York


HOWARD RUDNICK

In 1975 they promised me an interview
twice and never acted upon it.
E. Kram

2/18/77

17B

It is a fact that the
Board of Education
has opened several
lists on several occasions
since 1970 and 1972
and thereafter for positions;
and when I applied --
would tell me it was
after the deadline &
refused to consider
me due to any past
circumstances.

There were blemishes,
uncooperative, unsympathetic
and ~~to~~, under these circumstances,
un-obligated for lack
of remuneration & justice.

Therefore, the previous discriminatory
acts prevented any recognition of
being on a list re: seniority or eventual
tenure. EK - over -

Please also note that the
Board of Ed. never even
paid any courtesy or
~~consideration~~ consideration in
answering my letter (copy-exhibit)
of many months ago
regarding employment request
and if this is not their policy,
I claim it as retaliatory
discrimination

10/4/76.

